

Exhibit 16

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

INC.,)
Plaintiff,)
vs.) Civil Action No.
ELECTRONICS CO., LTD.,) 2:21-CV-463-JRG
ELECTRONICS AMERICA,)
SUNG SEMICONDUCTOR, INC.,)
Defendants.)
)

VIRTUAL VIDEOCONFERENCE VIDEO-RECORDED
DEPOSITION OF SUNGJOO PARK

Remotely Testifying from Hwaseong, South Korea
Wednesday, November 23, 2022 (Local GMT+9 Zone)

23 Stenographically Reported By:
24 Hanna Kim, CLR, CSR No. 13083
25 Job No. 5567465

15 [REDACTED],
16 virtual videoconference video-recorded deposition of
17 SUNGJOO PARK, remotely testifying from Hwaseong,
18 South Korea, on Wednesday, November 23, 2022 (Local
19 GMT+9 Zone), pursuant to the stipulations of counsel
20 thereof, before Hanna Kim, CLR, Certified Shorthand
21 Reporter, No. 13083.

1 REMOTE VIDEOCONFERENCE APPEARANCES OF COUNSEL:

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3 FOR PLAINTIFF NETLIST, INC.:

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11 FOR DEFENDANTS SAMSUNG ELECTRONICS CO., LTD.,
12 SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG
13 SEMICONDUCTOR, INC.:

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1 REMOTE VIDEOCONFERENCE APPEARANCES: (CONTINUED)
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3 ALSO PRESENT:
4 SOOMI KO, Korean-language main/official
5 interpreter
6 MICHELLE KIM, Check interpreter
7 SHAWNA HYNES, Video Operator
8 NEIL MARTIN, Concierge
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A horizontal bar chart illustrating the percentage of respondents who have heard of different topics. The y-axis lists 15 topics, each represented by a black bar. The x-axis represents the percentage scale from 0% to 100%, with major grid lines at 0%, 50%, and 100%. The bars are ordered from highest percentage at the top to lowest at the bottom.

Topic	Percentage (%)
Healthcare	98
Technology	95
Finance	92
Politics	90
Entertainment	88
Science	85
Art	82
Sports	80
Food	78
History	75
Literature	72
Environment	68
Space Exploration	65
Mathematics	62
Engineering	58
Chemistry	55

17 BY MR. SHEASBY:

18 Q. Let's look at Exhibit 7.

A. Looks like I was the ballot sponsor.

22 Q. This is a document submitted to JEDEC
23 prepared by Samsung Electronics in 2007 discussing
24 DRAM; correct?

25 MS. JESIEN: Objection. Form.

1 THE WITNESS: I don't think the entire
2 document --

3 (Interruption in audio/video.)

4 THE COURT REPORTER: Could you -- could
5 you start that over again, please.

6 THE MAIN INTERPRETER: Okay.

7 THE WITNESS: I don't think it was the
8 entire document. I think some portion was modified.
9 And let me look for that.

10 THE MAIN INTERPRETER: Also, Hanna,
11 previously the answer is not -- I think I
12 mispronounced it ballot, not "valid," B-A-L-L-O-T.

13 THE WITNESS: Since these are not
14 color- -- coloring was -- oh, strike that.

15 Since the fonts are not separated by
16 colors, I don't exactly know which portion was
17 updated.

18 BY MR. SHEASBY:

19 Q. The point is this was a proposal that was
20 sponsored by Samsung?

21 A. It is true that that's a ballot Samsung
22 sponsor [verbatim], since my name and Samsung's name
23 is there.

24 Q. And it's from 2007; correct?

25 A. Yes. That's correct.

1 Q. And why don't you turn to PDF page 147 of
2 this document -- 140- -- PDF page 147.

3 A. Yes, I am there.

4 Q. Do you see under the section "Seri-" --
5 "Serial Presence Detect"?

6 A. Yes, I see that.

7 Q. It says, quote, "a rank of memory is
8 defined as the collection of SDRAMs," plural,
9 "driven by a given rank select signal."

10 A. Do you see that?

11 A. Yes, I see that.

12 Q. Sir, this statement is incorrect; the
13 accepted definition of rank in 2007 or 2008 in the
14 concept of DRAM memory modules includes a single
15 DRAM; correct?

16 MS. JESIEN: Objection. Form.

17 THE WITNESS: No, that's not right.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1 CERTIFICATE OF REPORTER

2 I, Hanna Kim, a Certified Shorthand
3 Reporter, do hereby certify:

4 That prior to being examined, the witness
5 in the foregoing proceedings was by me duly sworn to
6 testify to the truth, the whole truth, and nothing
7 but the truth;

8 That said proceedings were taken before me
9 at the time and place therein set forth remotely via
10 videoconference and were taken down by me in
11 shorthand and thereafter transcribed into
12 typewriting under my direction and supervision;

13 I further certify that I am neither
14 counsel for, nor related to, any party to said
15 proceedings, not in anywise interested in the
16 outcome thereof.

17 Further, that if the foregoing pertains to
18 the original transcript of a deposition in a federal
19 case, before completion of the proceedings, review
20 of the transcript [x] was [] was not requested.

21 In witness whereof, I have hereunto
22 subscribed my name this 12th day of December, 2022.

23
24

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Hanna Kim, CLR, CSR No. 13083